UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

MILDRED BALDWIN, RONALD STRUCKOFF, STEPHEN BLATT, and MICHAEL SERATI, on behalf of themselves and others similarly situated,

Plaintiffs

VS.

HEARINGPRO, INC. and MIRACLE-EAR, INC.

Defendants

VS.

LAS DAVIS ENTERPRISES, INC.; HEARINGPRO, INC.; and TIFFANY DAVIS

Third-Party Defendants.

Case No. 20-cv-1502 (JRT/HB)

PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL

OF CLASS ACTION

SETTLEMENT

Pursuant to Federal Rules of Civil Procedure 23 and Local Rule 7.1, Plaintiffs, by and through their undersigned counsel, respectfully move this Court for an Order granting preliminary approval of a class action settlement with Defendants HearingPro, Inc. and Miracle-Ear, Inc. In support of this Motion, Plaintiffs submit a Notice of Hearing, Memorandum of Law, supporting Declarations, Meet and Confer Statement, and a Proposed Order.

WHEREFORE, Plaintiffs request that the Court grants Plaintiffs' motion for Preliminary Approval of Class Action Settlement.

Respectfully Submitted,

Dated: March 25, 2022

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